

## **Exhibit 53**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

**Declaration of Brian Lambert**

1. My name is Brian Lambert and I make this declaration based on my personal knowledge.

2. I received a Bachelor of Arts in Elementary Educations in 1997 from University of Arizona and a Master of Education, Educational Leadership in 1999 from Northern Arizona University.

3. I have 28 years experience working in K-12 education.

4. I have been Regional Assistant Superintendent at Tucson Unified School District (“TUSD”) since July 2018 and have worked within TUSD since 1995. Before being a Regional Assistant Superintendent, I was K-8 principal, Coordinator of Student Discipline in Student Equity, Middle School Assistant Principal, Elementary Principal, Teacher at both Elementary and Middle School, and a Monitor/Teacher Assistant in TUSD.

5. In my position as Regional Assistant Superintendent, I provide oversight and collaborate with principals to address the impact of social media on school environments. This includes responding to disruptions at the school or classroom level, supporting investigations related to behavioral concerns, and ensuring timely and effective communication with parents.

6. Currently, addressing the effects of social media on TUSD is one of the biggest challenges we address as a district. Social media permeates and exacerbates many, if not most, of the substantial issues that students in my region’s schools are dealing with. Accordingly, a substantial amount of my work time, and the work time of my colleagues and the school site administrators, e.g., principals and assistant principals, that I oversee, and their staff, is spent addressing the fallout of social media’s negative impact on students.

7. In my experience, I have seen a growing problem of addictive, compulsive, and problematic social media use among our students. We face a constant battle in separating students from their phones as students are unable to regulate or control their use of social media. Both parents and students report sleep deprivation amongst students in our school district due to excessive social media use.

8. I have also observed an alarming rise in student anxiety and depression which I believe is tied to social media. Since around 2016–17, students have become more dependent on social media for peer interaction, especially during periods of isolation. This shift has amplified the emotional impact of digital engagement, where the number of followers and the visibility of likes and comments on posts have become central to students' self-worth and social standing. The constant comparison and validation-seeking behaviors fostered by these platforms have contributed to heightened stress, diminished self-esteem, and strained peer relationships.

9. Ultimately, there are numerous negative effects from students' personal use of social media that I and school administrators in our school district must address. These effects include, but are not limited to, excessive use of social media which impacts student's mental health, and emotional wellbeing and causes classroom disruption, negative impacts on performance in school, and students' use of fake social media accounts which expose children to dangerous situations on social media, and/or bullying and harassment that occurs on social media platforms and spills over into the school environment.

10. Importantly, I have observed that the impacts of social media on students' wellbeing are unique to social media use. For instance, I have observed that many students experience negative mental health impacts directly tied to their use of social media, such as depression, anxiety, suicidal ideations, self harm, sleep disturbances, body dissatisfaction and

eating disorders. I have not observed similar effects from students' general use of cell phones, e.g., texting.

11. Similarly, bullying and harassment that occurs on social media platforms exacerbate the issues I and the school site administrators I oversee and work with must address, as the bullying and harassment are disseminated further and for longer periods of time than they would be absent a social media platform and social media emboldens students to engage in this type of behavior that does not occur when interacting in person.

12. In several instances, students have created anonymous social media accounts specifically designed to incite or glorify school violence—commonly referred to as “fight pages.” These pages often include videos of physical altercations occurring on campus, which are then widely circulated among students. Unfortunately, because these pages are hosted on external platforms, schools have no authority to remove the content, even when it clearly contributes to a hostile environment. In addition to fight pages, we have encountered anonymous social media accounts that target individual students through bullying, harassment, or public shaming. These accounts often post derogatory content, spread rumors, or share manipulated images and videos of students without their consent. In some cases, students have been mocked through the creation of GIFs or short videos that are widely shared among peers, further increasing feelings of isolation and anxiety. In my opinion, social media platforms encourage this type of behavior by students through likes, comments, and other platform features.

13. Social media-fueled challenges have also created serious disruptions during the school day, requiring immediate administrative response. For example, during the height of certain viral trends—such as the “Devious Licks” challenge where students were encouraged to vandalize or steal school property—principals were faced with significant behavioral issues and property

damage. These challenges often gained rapid traction among students, creating a wave of copycat incidents that not only disrupted the educational environment but also strained campus supervision and resources. Responding to these incidents requires school leaders to investigate, identify responsible individuals, and coordinate appropriate disciplinary actions, all while communicating with impacted staff, students, and families. As a Regional Assistant Superintendent, I work closely with site administrators to support their response efforts, ensure due process, and reinforce campus-wide expectations for behavior. These challenges underscore the powerful—and often detrimental—influence social media can have on student decision-making and school culture.

14. These numerous negative effects from students' personal use of social media cause many issues that I must address as a Regional Assistant Superintendent and that the school site administrators I oversee and work with must address. For example, when social media use contributes to student mental health concerns—such as increased anxiety, depression, or feelings of isolation I am often involved in supporting schools as they navigate appropriate interventions and provide access to mental health resources. Additionally, when incidents of cyberbullying arise, particularly those targeting students within our school communities, I work closely with principals to mediate conflicts, engage families, and implement supportive and disciplinary measures as needed. Excessive or inappropriate social media use can also correlate with declining academic performance, and I collaborate with school leaders to identify and support impacted students through targeted interventions. The scope and complexity of these challenges continue to grow, demanding attention, planning, and collaborative problem-solving at both the school and regional level.

15. The time that I and the school site administrators I oversee and work with must spend on social media related impacts on students has substantially increased in the time that I have worked at TUSD.

16. As a Regional Assistant Superintendent, I maintain consistent and direct engagement with the school site administrators I support. This includes regular meetings to review behavioral data, incident reports, and social-emotional learning trends; participation in leadership team discussions; and consultation on student discipline, crisis response, and parent communication. Through this ongoing collaboration and oversight, I understand the large amount of time principals and their teams spend dealing with the impacts of student social media use. This includes investigating incidents, documenting behavior in student information systems, facilitating restorative or disciplinary processes, and engaging with families.

17. When I first started as a Regional Assistant Superintendent in 2018, I believe that approximately 3% of an elementary school site administrator's time, 10-15% of a middle school site administrator's time, and 15-20% of a high school site administrator's time was spent on social media related concerns and addressing the impacts of students' personal social media use. By 2020, that number had risen to around 10% for elementary schools, 30% for middle schools, and 25-30% for high schools. Now in 2025, I believe elementary school site administrators spend anywhere from 10-15%, middle school site administrators anywhere from 30-40%, and high school site administrators 25-35% of their work time addressing social media concerns and the impacts of students' personal use of social media.

18. Because of the percentage of time that I and the school site administrators I oversee and work with spend on addressing social media impacts on students, this means we have less time to dedicate to other aspects of our jobs. For example, mental health services and social emotional

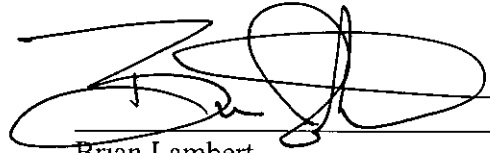
classroom lessons are similarly affected, with schools frequently needing to shift from providing individualized counseling or classroom lessons to running group sessions due to the high volume of students impacted by online harassment, anxiety, or peer conflict linked to social media. The rise in threat assessments driven by social media threats has further strained administrative and support teams. Each incident typically necessitates a formal investigation, often led by site administrators, which diverts critical time and resources away from instructional leadership and student support. For example, when a threat is made via social media, a comprehensive risk assessment must be conducted in alignment with district safety protocols. This process can involve multiple staff members—administrators, counselors, and school resource officers—and often extends over several days. These urgent matters often require canceling previously scheduled meetings or student services, disrupting the continuity of care and planning for students in need. Instructionally, teachers and school leaders are forced to make reactive adjustments to curriculum pacing or classroom structures to manage the social and emotional fallout from online activity, resulting in reduced learning time and diminished instructional focus. Unlike traditional conflicts that may occur in a hallway and remain contained, digital posts spread rapidly, often involving students across grade levels, campuses, and even districts. This rapid dissemination increases the number of students impacted, requiring extensive parent communication, peer mediation, safety planning, and in some cases, disciplinary hearings. The time required to resolve these issues grows exponentially as administrators work to track down original sources, verify information, and manage the heightened emotions and misinformation that follow.

19. While having additional school site administrators or similar staff would be helpful in addressing the negative impacts that the rising use of social media by students has had on students and the district, TUSD has not been able to increase hiring commensurate with the needs

of the student population that has been negatively impacted by social media due to funding constraints.

20. I regularly interact with other Regional Assistant Superintendents overseeing elementary schools within TUSD. Based on these interactions, my understanding is that my experience is representative and that other Regional Assistant Superintendents and the school site administrators in the schools they directly oversee also spend a significant amount of their days addressing social media related concerns and that the amount of time they have had to spend on social media related concerns has increased substantially over the last several years.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 12, 2025.



Brian Lambert